

REMARKS

Claims 14-24 and 26-38 have been canceled. Claims 1-13, 25, and new claims 39-54 are in this application.

Claims 1-38 were rejected under 35 U.S.C. 102(e) as being anticipated by Cheung et al.

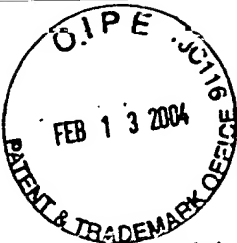
Amended independent claim 1 now recites in part the following:

“motion detection means for detecting at least one motion in an area having at least one pixel in said image data;

deviation detection means for detecting the deviation of the at least one motion in the area having at least one pixel; and

noise detection means for detecting the noise exhibiting area based on a predetermined threshold and the detected deviation.”

It is respectfully submitted that the portions of Cheung relied on by the Examiner (hereinafter merely “Cheung”) do not disclose the above features of claim 1. As an example, it is respectfully submitted that Cheung does not disclose “detecting the noise exhibiting area based on a predetermined threshold and the detected deviation,” as in claim 1. Although Cheung mentions noise detection, such detection of Cheung appears to be performed based on a difference between a pixel value of a current frame and a reference value obtained from pixel values of a prior frame. Additionally, instead of detecting an area, Cheung appears to perform noise detection pixel-by-pixel. Accordingly, it is believed that claim 1 is distinguishable from Cheung. For similar reasons, it is also believed that amended independent claims 13 and 25 are distinguishable from Cheung.



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Claims 2-12 and 39-54 are respectively dependent from one of the amended independent claims and, due to such dependency, are also believed to be distinguishable from Cheung for at least the reasons previously described.

In the event that the Examiner disagrees with any of the foregoing comments concerning the disclosure in the cited prior art, it is requested that the Examiner indicate where in the reference, there is the bases for a contrary view.

Please charge any fees incurred by reason of this response and not paid herewith to
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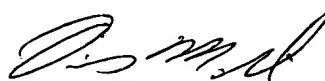
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Respectfully submitted,
FROMMER LAWRENCE & HAUG LLP

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